# UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO, as representative of
THE COMMONWEALTH OF PUERTO
RICO, et al.

Case No. 17 BK 3283-LTS
(Jointly Administered)

MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL MONITOR, LLC AT OMNIBUS HEARING SCHEDULED FOR JULY 24-25, 2019

### TO THE HONORABLE COURT:

COMES NOW, Cantor-Katz Collateral Monitor, LLC (the "Collateral Monitor"), by and through its undersigned counsel, hereby submits this motion to inform in compliance with this Honorable Court's *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019 Omnibus Hearing* (the "Scheduling Order") [Dkt. No. 7963], and respectfully states as follows:

Douglas S. Mintz and Peter J. Amend, of Orrick, Herrington & Sutcliffe LLP, will appear
in person on behalf of the Collateral Monitor at the Hearing (as defined in the Scheduling
Order). Mr. Mintz may appear at the San Juan courtroom or may appear in Courtroom 17C

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747).

at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007. Mr. Amend will appear in the New York courtroom.

- 2. Mr. Mintz may present argument in connection with the following matters:
  - a. Amended Motion of (I) Financial Oversight and Management Board, Acting
    Through its Special Claims Committee, and (II) Official Committee of Unsecured
    Creditors, under Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule
    3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect
    to Omnibus Objections to Claims of Holders of Certain Commonwealth General
    Obligation Bonds Issued in 2011, 20912 and 2014, and for Related Relief
    Requested. (Docket 7154); and
  - b. Limited Objection and Reservation of Rights of the DRA Parties to the Amended Motion of (I) Financial Oversight and Management Board, Acting Through its Special Claims Committee, and (II) Official Committee of Unsecured Creditors, under Bankruptcy Code Sections 105(A) and 502 and Bankruptcy Rule 3007, to (A) Extend Deadlines and (B) Establish Revised Procedures with Respect to Omnibus Objections to Claims of Holders of Certain Commonwealth General Obligation Bonds Issued in 2011, 20912 and 2014, and for Related Relief Requested. (Docket 7492).
- 3. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. will attend the hearing and be seated in the San Juan courtroom.

4. The Collateral Monitor reserves the right to respond, as necessary, to any statements made at the Hearing or otherwise by any party in connection with the above-captioned Title III case.

WHEREFORE, for the foregoing reasons, the Collateral Monitor respectfully requests that this Honorable Court take notice of its compliance with the Scheduling Order.

#### RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of July 2019.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

/s/Carmen D. Conde Torres Carmen D. Conde Torres, Esq. USDC 207312

/s/Luisa S. Valle Castro Luisa S. Valle Castro, Esq. USDC No. 215611

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/s/ Douglas S. Mintz
Douglas S. Mintz, Esq.
(admitted pro hac vice)

/s/Peter J. Amend Peter J. Amend, Esq. (admitted pro hac vice)

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